

1/03/2021



APA Group Policy

Anti-Bribery & Corruption Policy

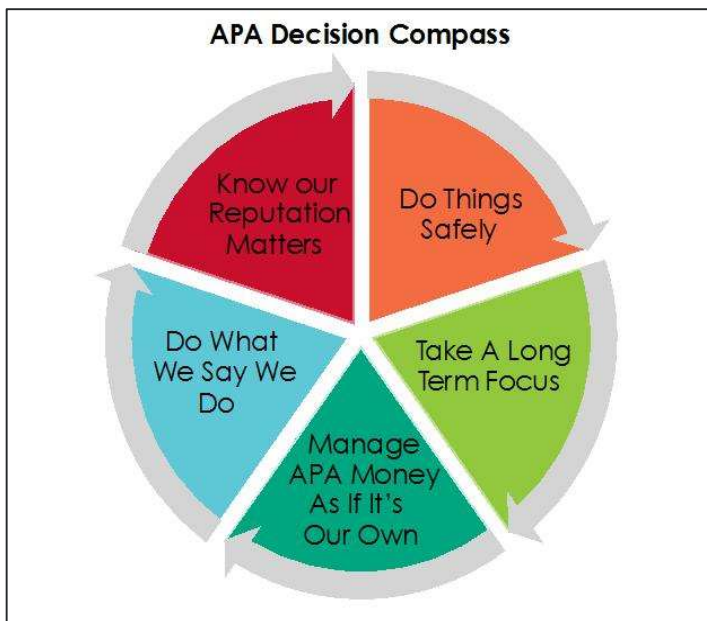
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1 Purpose

This Anti-Bribery and Corruption Policy (Policy) is one of a number of policies and codes implemented to foster a culture of compliance and responsible, ethical decision-making within APA Group (APA).

2 Decision Compass



The application of this Policy is key to ensuring business activities are conducted with integrity. This includes preventing, detecting and eliminating bribery, corruption and any form of fraudulent activity.

The Policy supports decision making as part of the APA Decision Compass under the segments “**Do What We Say We Do**” and “**Know our Reputation matters**”.

3 Scope

This Policy applies to all APA employees, directors, contractors, consultants, suppliers and other third parties acting on our behalf across the APA Group. For the purpose of this Policy, these are collectively referred to as **APA personnel**.

Gifts and entertainment, sponsorships, political donations, charitable contributions and sponsored travel have the potential to be misused for improper purposes such as influencing decisions or obtaining preferential treatment. As such they are considered under this Policy.

This Policy must be read together with the Anti Bribery and Corruption Standard and associated process documents.

4 APA position and principals

APA's policy on Anti-Bribery and Corruption is as follows:

APA prohibits bribery and corruption in any form, whether direct or indirect, or whether public or private. Key principles of this Policy are:

- **Maintaining standards:** APA will maintain anti-bribery and corruption and fraud prevention programs to drive awareness, transparency and a culture of ethical decision making.
- **Gifts and other benefits:** The receipt of gifts and other benefits of a material nature is generally discouraged. The giving and receipt of gifts or other benefits must be appropriate (including infrequent giving or receipt) and subject to relevant approvals and documentation.
- **Sponsorships and donations:** Sponsorships and donations for selected commercial, charitable and community organisations is an important part of APA's commitment to "strengthen communities through responsible energy". Sponsorships and donations are managed through the community investment program and are subject to review and approval. APA does not make sponsorships to organisations that are, or could be perceived to be:
 - Political in nature
 - Promoting a particular religious view
 - Acting to the detriment of public health and safety
 - Inappropriately advancing the interests of particular individuals or small groups not aligned with APA.
- **Political donations:** APA does not make direct political donations. Payment for attendance at political fundraising functions (indirect donations) is permitted in limited circumstances and subject to approval.
- **Third party due diligence:** APA performs due diligence enquiries over third parties before entering agreements. These enquiries and checks will be recorded and will cover include anti-bribery and corruption and sanctions and money laundering risks.

5 Policy objectives

APA is subject to national and international laws prohibiting bribery and corruption. As an ASX listed entity this also includes ASIC and ASX corporate governance principles and requirements.

The objectives of this Policy are to:

- Ensure APA at all times complies with bribery and corruption law and the requirements set out under this Policy and applicable to the jurisdictions in which APA operates.

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- Set out the responsibilities of APA and APA Personnel in preventing, detecting and eliminating bribery and corruption.
- Define unacceptable behaviour in relation to bribery and corruption.

6 Roles and responsibilities

For the purposes of monitoring and managing risk across APA, the following specific responsibilities apply:

Position	Responsibility
Audit and Risk Management Committee (ARMC)	Approve the Anti-Bribery and Corruption Policy Oversee the Anti-Bribery and Corruption Programs
ELT /Executive Risk Management Committee (ERMC)	Review the Anti-Bribery and Corruption Policy Approvals to give or receive benefits or gifts in line with the policy and standard.
Managing Director	Encourage a culture of compliance Receive and action reports of solicited bribes and facilitation payments. Approve cash gifts and benefits in accordance with the policy and standard.
Group Risk, Compliance & Insurance	Ensure effective programs are in place to manage bribery and corruption risk, ensuring material breaches are reported to the ARMC. Ensure APA managers and personnel receive training on bribery and corruption risk. Maintain the gifts and other benefits register and the political donations register (via Vigilant)

7 Related documents

- Code of Conduct (our Code)
- Conflicts of Interest Policy
- Delegation of Authority document
- Anti-bribery and Corruption Standard
- People & Culture Standard
- Contracts and Commitment Standard
- Group Compliance Policy
- Procurement Policy
- Whistleblower Policy
- Risk Management Policy

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Version Control

Date	Version	Changes
24/10/2019 (v1)	Version 1.0	First draft new policy
22/12/2020 v2	Version 2.0	Updated to reflect new group policy template, gifts, sponsorships and donations